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April 14, 2025

**VIA CM/ECF**

The Honorable Thomas Vanaskie  
Stevens & Lee  
1500 Market Street, East Tower  
18th Floor  
Philadelphia, Pennsylvania 19103

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No.  
1:19-md-02875 (D.N.J.)

Dear Judge Vanaskie:

I am writing in response to plaintiffs' April 14, 2025 letter regarding ZHP's production of certificates of analysis and material safety data sheets, as well as the parties' ongoing discussions related to a proposed stipulation regarding retention of custodial files.

***First***, with respect to the production of internal inspection records requested by plaintiffs via email on March 20, 2024, ZHP anticipates completing production of those documents as scheduled by tomorrow, April 15, 2025.

***Second***, with respect to the certified translations of the retention policies discussed by the Court and the parties during the March 25, 2025 status conference, ZHP provided the Court and plaintiffs with one translation last week. As ZHP noted in that

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email, the second translation was incomplete at that time, but was sent to plaintiffs earlier today.

*Third*, ZHP has provided plaintiffs with the industry standards governing the sale of dimethylformamide and triethylamine in China. Like similar standards governing the sale of raw materials in other countries—such as the United States Pharmacopeia reference standards—they are available online and set forth information about the quality of the raw materials being sold.

*Fourth*, ZHP sent plaintiffs a proposed stipulation related to custodial document retention on March 7, 2025. (See Exhibit A, March 7, 2025 Email from M. Hansen to A. Slater.) ZHP has not heard back from plaintiffs in over a month as to that proposal.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. Bernardo', with a long horizontal flourish extending to the right.

Richard T. Bernardo